

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust
Litigation, MDL 2817*

No. 1:18-CV-864

This document relates to:

Hon. Robert M. Dow, Jr.

Authenticom, Inc. v. CDK Global, LLC,
No. 1:18-cv-868 (N.D. Ill)

Magistrate Judge Jeffrey T. Gilbert

*Motor Vehicle Software Corp. v. CDK Global,
et al.,* No. 1:18-cv-00865 (N.D. Ill.)

**REYNOLDS'S RESPONSE TO [DKT. 1288]
DBW PARTNERS, LLC'S MOTION FOR LEAVE TO INTERVENE**

Reynolds takes no position on DBW Partners, LLC's ("DBW") Motion for Leave to Intervene.

For the avoidance of doubt, however, Reynolds reserves its right to oppose any forthcoming motion by DBW to unseal exhibits to the briefing relating to Plaintiffs' motion for sanctions.

At this stage in the proceedings, there is no public right of access to bona fide confidential documents produced pursuant this Court's Protective Order that have not been admitted into evidence and do not underpin any judicial decision. *See Baxter Int'l, Inc. v. Abbott Lab'ys*, 297 F.3d 544, 545 (7th Cir. 2002).

Though DBW has not specified exactly which exhibits it intends to move to unseal, its motion for leave to intervene implies that it may take a narrow view of the parties' bona fide confidentiality interests. Reynolds will respond as appropriate to any forthcoming motion by DBW to unseal exhibits in due course if and when it is filed.

Dated: June 1, 2021

Respectfully submitted,

/s/ Aundrea K. Gulley

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Company

CERTIFICATE OF SERVICE

I, Brian T. Ross, an attorney, hereby certify that on June 1, 2021, I caused a true and correct copy of the foregoing **REYNOLDS'S RESPONSE TO DBW PARTNERS, LLC'S MOTION FOR LEAVE TO INTERVENE** to be served electronically on all counsel of record at the following email address:

SERVICE-EXTERNAL-DMS-MDL@lists.kellogghansen.com

/s/ Brian T. Ross

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